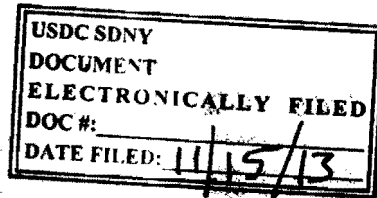


LAW OFFICES OF BOBBI C. STERNHEIM

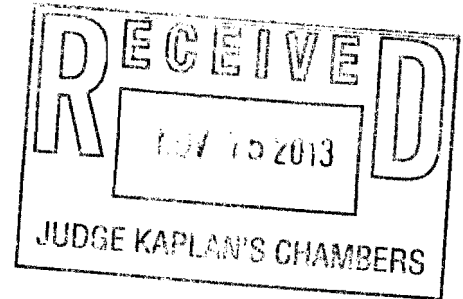
212-243-1100 • Main
917-306-6666 • Cell
888-587-4737 • Fax

33 West 19th Street - 4th Floor
New York, New York 10011
bc@sternheimlaw.com

MEMO ENDORSED



November 14, 2013



Honorable Lewis A. Kaplan
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: United States v. Khalid Al Fawwaz
S7 98 Cr. 1023 (KAF)

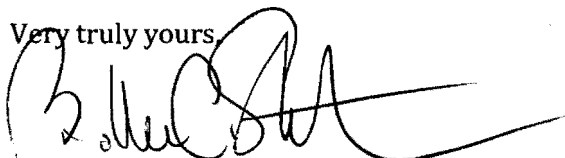
Dear Judge Kaplan:

With the consent of the government, I write to request an enlargement of time to reply to the government's opposition to the motion with respect to classified discovery filed on behalf of Khalid Al Fawwaz on October 10, 2013. Co-counsel David V. Kirby and Barbara E. O'Connor are out of district until November 21st and unable to confer with me in the SCIF regarding our reply. Accordingly, we are requesting permission to file any reply by December 2, 2013. We also request permission to file any objection to the government's request for joinder on December 2d, rather than on December 1st, the Sunday of Thanksgiving weekend.

On May 8, 2013, the Court entered an Order setting a schedule for various filings pursuant to Sections 5 and 6 of CIPA. (See Docket Entry No. 1208). For a variety of reasons, often on consent of the parties, the Court has adjourned several of the dates contemplated by the May 8 schedule. One of the bases for relief sought by the instant motion is leave of the Court to file additional notices pursuant to Section 5 of CIPA. Given the pendency of that request, the parties jointly request that the current CIPA briefing schedule be vacated, and that the parties propose a new, consolidated schedule at the December 12th status conference, which will result in coordinated CIPA-related briefing by the parties.

Your consideration is greatly appreciated.

Very truly yours,


BOBBI C. STERNHEIM

cc: Counsel for all parties

SO ORDERED


LEWIS A. KAPLAN, USDJ
11/15/13